

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SUOMEN COLORIZE OY,)
)
Plaintiff,)
)
v.) C.A. No. 12-00715-CJB
)
VERIZON COMMUNICATIONS INC.,)
VERIZON SERVICES CORP.,) JURY TRIAL DEMANDED
VERIZON ONLINE LLC, and)
VERIZON DELAWARE LLC,)
)
Defendants.)

**STIPULATION AND NOTICE OF VOLUNTARY DISMISSAL OF
DEFENDANT VERIZON COMMUNICATIONS INC. WITHOUT PREJUDICE**

1. Plaintiff Suomen Colorize Oy (“SCO”) and Defendants Verizon Communications Inc. (“VCI”), Verizon Services Corp. (“VSC”), Verizon Online LLC (“VOL”), and Verizon Delaware LLC (“Verizon Delaware”) consent pursuant to Federal Rule of Civil Procedure 41(a)(1) to amend the Complaint by dismissing Verizon Communications Inc. without prejudice;

2. Defendants VCI, VSC, VOL, and Verizon Delaware have represented to SCO that VCI is a holding company with no role in offering, selling, or otherwise providing any accused products or services;

3. Defendants VCI, VSC, VOL, and Verizon Delaware also have represented to SCO that, for the purposes of the above-captioned case only and for no other matter;

a. VSC, VOL, and Verizon Delaware (“Remaining Verizon Defendants”) will not take the position that SCO’s claims should fail because SCO has not sued the proper Verizon entity or entities;

b. Remaining Verizon Defendants will not refuse to provide discovery on the grounds that VCI is in possession, custody, or control of such discovery; and

c. VCI will not seek declaratory relief against SCO in relation to U.S. Patent No. 7,277,398 so long as SCO does not seek to reinstate any infringement claims against VCI in relation to U.S. Patent No. 7,277,398.

4. The parties further agree that this Notice of Voluntary Dismissal or any portion thereof shall not be argued to be evidence of infringement or non-infringement, validity or invalidity, and shall not be presented to or mentioned in front of the jury at any trial of this case as such evidence or for any other purpose.

NOW THEREFORE

In reliance upon the above representations and pursuant to Fed. R. Civ. P. 41(a)(1), SCO by and through undersigned counsel hereby voluntarily dismisses only defendant Verizon Communications Inc. from this action, without prejudice and without costs.

Respectfully submitted,

BAYARD, P.A.

/s/ Stephen B. Brauerman

Richard D. Kirk, Esq. (# 922)
Stephen B. Brauerman, Esq. (# 4952)
222 Delaware Avenue, Suite 900
P.O. Box 25130
Wilmington, DE 19899
(302) 655-5000
rkirk@bayardlaw.com
sbrauerman@bayardlaw.com

Attorneys for Plaintiff Suomen Colorize Oy

OF COUNSEL

Karen H. Bromberg, Esq.
Francisco A. Villegas, Esq.
Damir Cefo, Esq.
Joyce E. Kung, Esq.
COHEN & GRESSER LLP
800 Third Avenue
New York, New York 10022
(212) 957-7600
kbromberg@cohengresser.com
fvillegas@cohengresser.com
dcefo@cohengresser.com
jkung@cohengresser.com

Attorneys for Plaintiff Suomen Colorize Oy

Dated: July 26, 2012

SEITZ ROSS ARONSTAM & MORITZ LLP

/s/ Benjamin J. Schladweiler

Collins J. Seitz, Jr., Esq. (#2237)
Benjamin J. Schladweiler, Esq. (#4601)
100 S. West St., Suite 400
Wilmington, DE 19801
(302) 576-1600
cseitz@seitzross.com
bschladweiler@seitzross.com

*Attorneys for Defendants Verizon
Communications Inc., Verizon Services Corp.,
Verizon Online LLC, and Verizon Delaware
LLC*

OF COUNSEL

John L. North, Esq.
Darcy L. Jones, Esq.
KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP
Two Midtown Plaza, Suite 1500
1349 West Peachtree Street, N.W.
Atlanta, GA 30309

Norman E.B. Minnear, Esq.
KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP
1633 Broadway
New York, NY 10019

*Attorneys for Defendants Verizon
Communications Inc., Verizon Services Corp.,
Verizon Online LLC, and Verizon Delaware
LLC*

SO ORDERED, this _____ day of _____, 2012.

United States District Judge